

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

IN RE: ZIMMER NEXGEN KNEE	)	
IMPLANT PRODUCTS LIABILITY	)	MDL NO. 2272
LITIGATION	)	
	)	
This Document Applies to	)	
	)	Master Docket Case No.
Kathy Batty,	)	1:11-cv-05468
No. 1:12-cv-6279	)	Hon. Rebecca R. Pallmeyer

**MOTION FOR JUDGMENT AS A MATTER OF LAW**

Zimmer, Inc., through its undersigned counsel, hereby moves this Court for an Order granting judgment as a matter of law pursuant to Federal Rule 50(a). The legal and factual bases for the Motion are stated fully within the accompanying Memorandum in Support of Motion for Judgment as a Matter of Law.

Dated: October 23, 2015

Respectfully submitted,

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*Lead counsel for Zimmer, Inc.*

### **CERTIFICATE OF SERVICE**

I certify that on October 23, 2015 a copy of the foregoing **MOTION FOR JUDGMENT AS A MATTER OF LAW** was filed electronically. Parties may access this filing through the Court's electronic records system.

/s/ James A. O'Neal